

January 17, 2013

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

Re: Ex Parte Presentation, Telecommunications Relay Service and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123

Dear Ms. Dortch:

The purpose of this filing is to reiterate and re-emphasize that an NPRM should be used to gather information about IP CTS. As we noted in our filing of December 2012, "a normal notice and comment cycle is the appropriate way to approach issues such as this." We continue to believe that an NPRM rather than an Emergency Order is the proper way to develop rules for IP CTS.

Sincerely,

Brenda Battat

Executive Director

Brende Battat